

**UNITED STATES DISTRICT COURT
DISTRICT OF PUERTO RICO**

IN RE:

THE FINANCIAL OVERSIGHT AND
MANAGEMENT BOARD OF PUERTO
RICO

As representative of

THE COMMONWEALTH OF PUERTO
RICO,

Debtors

PROMESA
Title III

No. 17 BK 3283-LTS

Re: ECF Nos. 5699, 5704, 6039 and
6082

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SAN JUAN, P.R.

**URGENT MOTION CLARIFYING AND CORRECTING ERRORS PRESENT
IN MOTION Case No. 17 BK 32830, ECF No.6082**

To the Honorable United States District Court Judge Laura Taylor Swain:

COME NOW Pedro Carbonera Pardo ("Mr. Carbonera" or Movant"), pro se, respectfully submitting this urgent motion clarifying and correcting errors present in *Motion Requesting Assistance in the Translation of all Attachments or the Withdrawal of the Attachments re: 5699 Motion for Relief From Stay Under 362 (e) filed by Pedro E. Carbonera-Pardo, pro se* [**Case No. 17 BK 32830, ECF No. 6082**]

Among other errors, Motion [**Case No. 17 BK 32830, ECF No. 6082**] should have specifically mentioned that the Movant is requiring a **free of charge** assistance for translation of all the attachments included Spanish in the Motion seeking relief from the automatic stay Docket No. 5699

Background

1. On March 14, 2019, Pedro Carbonera Pardo (the “Movant”) filed the *Urgent Motion for Partial Relief from Automatic Stay* [Case No. 17 BK 32830, ECF No. 5699 (“Docket 5699” from now on), seeking relief from the automatic stay to allow the case captioned *Pedro Carbonera Pardo v. Departamento del Trabajo y Recursos Humanos*, Case No. 2014-08-0412 (the “Prepetition Action”), pending before the Puerto Rico Commission for Appeals of Public Service (“CASP” for its initials in Spanish) to continue and proceed to judgment and to partially execute said judgment.
2. On March 15, 2019, the Court entered *the Scheduling Order, which provides that objections to the Motion must be filed by March 28, 2019, and Movant’s reply papers by April 4, 2019.* [Case No. 17 BK 32830, ECF No. 5704]
3. On March 26, 2019 The Commonwealth of Puerto Rico (the Debtor) filed a *Motion requesting extension of time(14 days, until April 11, 2019 days). To EXTENDING DEADLINES UNDER ORDER SCHEDULING BRIEFING. (Attachments: # 1 Proposed Order Extending Deadlines Under Order Scheduling Briefing) filed by Susana I Penagaricano-Brown on behalf of COMMONWEALTH OF PUERTO RICO.* [Case No. 17 BK 32830, ECF No.6039]
4. On March 27, the Court entered the *ORDER GRANTING 6039 Motion requesting extension of time (14 days, until April 11, 2019 days) EXTENDING DEADLINES UNDER ORDER SCHEDULING BRIEFING filed by COMMONWEALTH OF PUERTO RICO. Related document: 5699 Motion for Relief From Stay Under 362 (e) filed by Pedro E. Carbonera-Pardo. Responses due by 4/11/2019 at 5:00 PM*

(AST). Reply due by: 4/18/2019 at 5:00 PM (AST). Signed by Judge Laura Taylor Swain on 03/27/2019. [Case No. 17 BK 32830, ECF No 5704]

5. On March 27, 2019 the Movant filed *MOTION Requesting Assistance in the Translation of all Attachments or the Withdrawal of the Attachments re: 5699 Motion for Relief From Stay Under 362 (e) filed by Pedro E. Carbonera-Pardo, pro se.* [Case No. 17 BK 32830, ECF No.6082] **(Docket 6082 from now on)**

Corrections

1. The present Motion corrects errors made on Docket 6082.
2. The first and most important error consists of having failed to mention that the requested aid from the Court is a **free of charge aid request from the Court** in the translation from Spanish to English of the attachments written in Spanish and included in Docket 5699.
3. This Motion also clarifies that Docket 6082 referred to the attachments as they were named by the Movant on Docket 5699 and not as they were named on the ECF Docket. The Movant did not assigned an attachment number to the list of attachments on Docket No. 5699.
4. Another error is that on Docket 6082 page 6, item 23 there is a discrepancy on who originated the STUV. This document is originated by PR Department of Finance, not by the PR Department of Labor.

5 And the last error is that on the reference made to the Prepetition Action number, meaning the number given by the Appellative Commission for the Public Sector (CASP) to the Movants case, which was incorrectly mentioned on Docket 6082, page 7 item 25 second line. It should have read: 2014-08-0412, not only No. 2014.

6. Everything else remains unchanged on Docket 6082.

WHEREFORE, Movant respectfully requests to the Court to take into consideration the corrections made on this Motion to Docket 6082 for Honorable Laura Taylor granting either free assistance for the translation of attachments written in Spanish present in Docket 5699 or the withdrawal of these attachments.

I HEREBY CERTIFY: That on this same date, we electronically filed the foregoing motion with the Clerk of the Court using CM/ECF Filing System which will send a notification of such to the parties of records and to all interested subscribed users.

RESPECTFULLY SUBMITTED

In San Juan, Puerto Rico, this 29th of March 2019.



S/Pedro Carbonera-Pardo

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